



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 7, 2022

**BY ECF**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Concepcion*, 21 Cr. 479 (LAP)**

Dear Judge Preska,

The Government writes to request a one-week adjournment of the status conference scheduled for June 8, 2022 at 11:00 a.m., in the above referenced matter. Earlier this afternoon the defendant filed a renewed bail application, which references, among other things, a 2017 investigation by KIPP, as well as a criminal investigation being conducted in South Carolina. The Government intends to provide the Court with additional information about each of these points (and others in the submission) but needs additional time to gather this information. Furthermore, the Government learned today that the defendant is being housed in the segregated housing unit (the "SHU") at the MDC. The Government has contacted the BOP to determine the cause for the defendant's segregation from the general population, but the BOP has yet to respond to the Government's inquiry.

Accordingly, the Government seeks a one-week adjournment of the status conference to allow it the opportunity to gather additional information relevant to the defendant's application. The defense consents to a one-week adjournment. Finally, the Government requests, and the defense consents, that time be excluded to the date of the next conference for the same reasons.

The status conference is adjourned to June 15, 2022 at 10:30 a.m. in Courtroom 12A. Speedy Trial time is excluded from June 7, 2022 until June 15, 2022 in the interest of justice.

**SO ORDERED.**

Dated: June 8, 2022  
New York, New York

LORETTA A. PRESKA  
Senior United States District Judge

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: Camille L. Fletcher  
Camille L. Fletcher  
Elinor Tarlow  
Assistant United States Attorney  
Southern District of New York  
(212) 637-2383 / 1036

cc: Stephen G. McCarthy, Esq. (via Email and ECF)